



Ohio
Republican
Party

Robert T. Bennett
Chairman

Martha C. Moore
Vice Chairman

June 21, 1994

Federal Election Commission
Attn: Terry Reynolds - Reports Analyst
Reports Analyst Division
999 E. Street, NW
Washington, DC 20463

ID# - C00162339

RE: - April Quarterly Report (1/1/94 - 3/31/94)

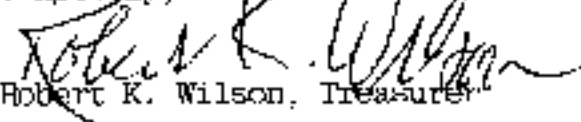
Dear Ms. Reynolds:

In response to your letter dated June 15, 1994, please be advised that The Ohio Republican Party utilizes an impressed payroll bank account into which funds are transferred from both the Federal Operating account and the State account to cover the expense of payroll, matching employer taxes and processing fees. The transfer of funds from the Federal Operating account covers payroll expenses for the headquarters political staff, finance staff and telemarketing staff. The transfer from the State account covers payroll expenses for our campaign center staff and other auxiliary staff members.

Since the impressed payroll bank account is classified as a Federal account the transactions are listed on Disbursement Schedule H-4. However since state funds are used to pay Campaign Center payroll costs through the impressed bank account an impermissible transfer of funds did not occur.

Please contact us if there are any additional questions.

Sincerely,


Robert K. Wilson, Treasurer



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

RQ-2

Robert K. Wilson, Treasurer
Ohio Rep State Central and Exec
Committee AKA The Ohio Rep Party
172 East State Street, Suite 400
Columbus, OH 43215

JAN 5 1994

Identification Number: C00162339

Reference: April Quarterly Report (1/1/94-3/31/94)

Dear Mr. Wilson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule H4 of your report discloses disbursements for "CATEGORY CAMPAIGN" (sample enclosed) which is listed as 100% non-federal. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(1). However, a 100% non-federal event does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Terry Reynolds

Terry Reynolds
Reports Analyst
Reports Analysis Division

DISBURSEMENT SCHEDULE H4

Page 35 of 46 for
Line Number 21a

Shared Federal/Non-Federal Activity

Name of Committee : Ohio Republican State Central and Executive Committee

Name and Address	Purpose/Event	Date	Total Amount	Federal Share	Non-Federal Share
SAM VAN VOORHIS 172 E. STATE STREET COLUMBUS, OH 43215	ADMIN. PAYROLL	03/30/94	1,383.13	307.05	1,076.08
CATEGORY ADMINISTRATIVE	Year-to-Date		246,609.02		
LANA TARROW 172 E. STATE STREET COLUMBUS, OH 43215	CAMPAIGN PAYROLL	03/30/94	2,213.00	0.00	2,213.00
CATEGORY CAMPAIGN	Year-to-Date		49,703.05		
KYLE SISK 172 E. STATE STREET COLUMBUS, OH 43215	CAMPAIGN PAYROLL	03/30/94	1,281.68	0.00	1,281.68
CATEGORY CAMPAIGN	Year-to-Date		49,703.05		
JOE KING 172 E. STATE STREET COLUMBUS, OH 43215	CAMPAIGN PAYROLL	03/30/94	1,671.75	0.00	1,671.75
CATEGORY CAMPAIGN	Year-to-Date		49,703.05		
JONATHAN HUGHES 172 E. STATE STREET COLUMBUS, OH 43215	CAMPAIGN PAYROLL	03/30/94	3,042.88	0.00	3,042.88
CATEGORY CAMPAIGN	Year-to-Date		49,703.05		
RAJU DINAPOLI 172 E. STATE STREET COLUMBUS, OH 43215	CAMPAIGN PAYROLL	03/30/94	1,393.13	0.00	1,393.13
CATEGORY CAMPAIGN	Year-to-Date		49,703.05		
MIKE BURITA 172 E. STATE STREET COLUMBUS, OH 43215	CAMPAIGN PAYROLL	03/30/94	1,114.50	0.00	1,114.50
CATEGORY CAMPAIGN	Year-to-Date		49,703.05		
VIRGINIA CHENEY 172 E. STATE STREET COLUMBUS, OH 43215	ADMIN. PAYROLL	03/30/94	835.88	185.57	650.31
CATEGORY ADMINISTRATIVE	Year-to-Date		246,609.02		
BRUCE PFAFF 172 E. STATE STREET COLUMBUS, OH 43215	ADMIN. PAYROLL	03/30/94	1,671.75	371.13	1,300.62
CATEGORY ADMINISTRATIVE	Year-to-Date		246,609.02		
Subtotal of Joint Federal and Non-Federal Activity this page			14,607.70	863.75	13,743.95

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☒ Hand Delivered

DATE OF RECEIPT

6-27-94

☐ First Class Mail

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☐ Registered/Certified Mail

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☐ No Postmark

☐ Postmark Illegible

☐ Received from the House Office of Records
and Registration

DATE OF RECEIPT

☐ Received from the Senate Office of Public
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

MMR

PREPARER

6-27-94

DATE PREPARED